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September 21, 2020

VIA ECF & EMAIL

Hon. Katherine Polk Failla
U.S. District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Courtroom 2103
New York, NY 10007
Failla_NYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

**Re: *Angeles v. Burwell Industries, Inc.*,
Civil Action No.: 1:20-cv-07098-KPF (S.D.N.Y.)**

Dear Judge Failla:

This firm represents Defendant Burwell Industries, Inc. ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Jenisa Angeles ("Plaintiff"), to respectfully request a thirty (30) day extension of time for Defendant to respond to the Complaint, up to and including October 23, 2020. This is the first request for an extension of this deadline.

By way of background, Plaintiff commenced this action on or about September 1, 2020. (ECF No. 1.) On September 2, 2020, Defendant was served with the Complaint. Accordingly, Defendant's responsive pleading deadline is presently September 23, 2020.

Defendant respectfully requests that its responsive pleading deadline be extended by thirty (30) days to provide additional time to both continue investigating the allegations in the Complaint, and consider a non-litigated resolution of this action with Plaintiff.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ *Samuel Sverdlov*

Samuel Sverdlov



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cc: All counsel of record (via ECF)

Application GRANTED. Defendant hereby has until October 23, 2020, to answer, move, or otherwise respond.

Dated: September 21, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE